

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

v.

CHAIM LEBOVITS, et al.,

Defendants.

PROTECTIVE ORDER

Case No: 1:11 Cr. 00134 (SJ)

-----X
WHEREAS the government has received documents from Phoenix Life Insurance Company, Ameritas Life Insurance Company/Union Central Life Insurance Company and Lincoln Financial Group (the "Insurance Companies") for use at the trial of the above case (the "Documents") against Defendants Chaim Lebovits and Leo Fekete (collectively, the "Defendants");

WHEREAS the Documents may contain confidential and/or proprietary information, including but not limited to insurance underwriting manuals, underwriting guidelines; and actuarial tables; and financial, health, and other personal information relating to insureds or proposed insureds; and

WHEREAS the Defendants and the United States Attorney's Office, all by their undersigned counsel, seek entry of this Order so as to protect such confidential and/or proprietary information from disclosure except as authorized herein;

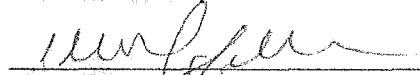
IT IS HEREBY ORDERED:

1. the Documents, which have been produced by the Insurance Companies for use by the government at trial are deemed "Confidential Information."
2. Such Confidential Information disclosed to the Government and Defendants' counsel during the course of proceedings in this action:

3. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding in this action.

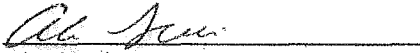
4. Any of the undersigned counsel can seek clarification from the Court as to any issue that arises regarding the implementation of the terms of this Order.

For Defendants:



Date: January ³⁰, 2014

Nathaniel Z. Mannur
Ballard Spahr Stillman &
Friedman, LLP
425 Park Avenue
New York, NY 10022
Attorneys for Chaim Lebovits



Date: January ³⁰, 2014

Alan Lewis
Carter Ledyard & Milburn LLP
2 Wall Street
New York, NY 10005
Attorneys for Leo Fekete

For the United States Attorney's Office:



Date: January ³⁰, 2014

Charles Kleinberg
Assistant United States Attorney
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201-1820

So Ordered:

HON. STERLING JOHNSON
UNITED STATES DISTRICT JUDGE

Date: January , 2014

I have read this Order and agree to be bound by its terms:

Print name

Signature

Date: January , 2014